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April 2, 2021

**VIA ECF**

Honorable Justice Analisa Torres  
United States District Judge  
US District Court, Courtroom 15D  
Southern District of New York  
500 Pearl St.  
New York, NY 10007-1312

Re: Claimant : Tamas Jonas  
Case Number: 1:19-cv-05574-AT  
Insured : Noble Construction Group, LLC  
D/Occ: : 3/22/2019  
Location : 222 East 44th Street, New York, NY  
Court : U.S. District Court, Southern District of NY

Dear Honorable Justice Torres:

We represent plaintiff Tamas Jonas in an action for personal injuries against defendants for violations under New York State Labor Law sections 200, 240(1) and 241(6). The within is respectfully submitted jointly with the consent of all parties in support of an application to adjourn the trial from May 17 to July 19. Because this application is being made on consent and the April 9 end date for filing the Joint Pre-Trial Order is rapidly approaching, the parties additionally agree to waive the 48-hour notice requirement for this letter motion.

As a threshold matter, there are multiple defendants, a third-party action and five potential fact witnesses not including Mr. Jonas. In addition, there are potentially nine expert witnesses, two which will be required to travel from outside of New York State. Recent reports from the CDC state indicate that the expectation is for Covid vaccination rates to be increased and for expansion of eligibility by May 1. Accordingly, a July trial date may be at a time when people can assemble indoors with lesser risk.

In addition, on March 19, 2021 the reply papers in support of plaintiff's motion for summary judgment were filed and submitted. On March 31 the parties had a settlement conference by telephone before Magistrate Judge Kevin N. Fox. It is respectfully submitted that a July trial date would permit the parties to reevaluate their positions after an order deciding the motion and would allow time for further settlement discussions.

Therefore, it is requested that the Court issue an order adjourning the trial date to July 19 and enlarging the end date for filing the Joint Pre-Trial Order to no earlier than June 11.

Thank you for hearing our entreaty.

Respectfully submitted,

BY: /s/  
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DENIED.

SO ORDERED.

Dated: April 5, 2021  
New York, New York



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ANALISA TORRES  
United States District Judge